

1 The Honorable Jamal N. Whitehead
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

8 CYMBIDIUM RESTORATION TRUST,

9 Plaintiff,

10 v.

11 AMERICAN HOMEOWNER
12 PRESERVATION TRUST SERIES AHP
13 SERVICING; its Trustee, U.S. BANK TRUST
14 N.A.; AHP CAPITAL MANAGEMENT, LLC;
15 AMERICAN HOMEOWNER
16 PRESERVATION SERIES 2015A+; its
17 Trustee, U.S. BANK TRUST NATIONAL
18 ASSOCIATION; AHP SERVICING, LLC; and
19 JORGE NEWBERY,

20 Defendants.

21 AMERICAN HOMEOWNER
22 PRESERVATION TRUST SERIES AHP
23 SERVICING.; AHP CAPITAL
24 MANAGEMENT, LLC; AMERICAN
25 HOMEOWNER PRESERVATION SERIES
2015A+; and; AHP SERVICING, LLC;

Counter-Plaintiffs,

v.

CYMBIDIUM RESTORATION TRUST,

Counter-Defendant.

No. 2:24-CV-00025-JNW

STIPULATED MOTION AND
[PROPOSED] ORDER CONTINUING
FRCP 26(a)(2) EXPERT DISCLOSURE

NOTE ON MOTION CALENDAR:
November 12, 2024

STIPULATED MOTION AND [PROPOSED] ORDER
CONTINUING FRCP 26(a)(2) EXPERT DISCLOSURE - 1
(No. 2:24-CV-00025-JNW)

CORR CRONIN LLP
1015 Second Avenue, Floor 10
Seattle, Washington 98104-1001
Tel (206) 625-8600
Fax (206) 625-0900

1 VAK CAPITAL TRUST I,

2 Intervenor-Defendant and
3 Counterclaim and
4 Crossclaim Plaintiff,

5 v.

6 CYMBIDIUM RESTORATION TRUST;

7 Counter-Defendant; and

8 AHP CAPITAL MANAGEMENT, LLC; and
9 AMERICAN HOMEOWNER
10 PRESERVATION SERIES 2015A+;

11 Cross-Defendants.

12 COME NOW the Plaintiff Cymbidium Restoration Trust (“Cymbidium”), Defendants
13 American Homeowner Preservation Trust Series AHP Servicing, American Homeowner
14 Preservation Trust Series 2015A+, AHP Capital Management, LLC, and AHP Servicing, LLC
15 (collectively “AHP Entities”) and Intervenor VAK Capital Trust I (“VAK”) and hereby stipulate
16 and agree to continue the FERCP 26(a)(2) deadline for disclosing expert testimony in this matter
17 from November 12, 2024 to December 3, 2024. There is good cause to extend these case deadlines
18 in order to permit additional time for ongoing meet and confers and follow-up discovery.

19 For the foregoing reasons, the parties jointly agree that there is good cause to continue
20 continue the FRCP 26(a)(2) deadline for disclosing expert testimony to December 3, 2024.

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STIPULATED MOTION AND [PROPOSED] ORDER
CONTINUING FRCP 26(a)(2) EXPERT DISCLOSURE - 2
(No. 2:24-CV-00025-JNW)

CORR CRONIN LLP
1015 Second Avenue, Floor 10
Seattle, Washington 98104-1001
Tel (206) 625-8600
Fax (206) 625-0900

1 DATED this 12th day of November, 2024.

2 I certify that this memorandum contains 117
3 words, in compliance with the Local Civil Rules.

4 CORR CRONIN LLP

5 s/ Jeffrey B. Coopersmith
6 Jeffrey B. Coopersmith, WSBA No. 30954
7 1015 Second Avenue, Floor 10
8 Seattle, Washington 98104-1001
9 Ph: (206) 625-8600
jcoopersmith@corrchronin.com

10 KMA ZUCKERT LLP

11 s/ Brian J. Benoit
12 Brian J. Benoit (admitted *pro hac vice*)
13 227 West Monroe Street, Suite 3650
14 Chicago, Illinois 60606
15 Ph: (312) 345-3065
16 bbenoit@kmazuckert.com

17 *Attorneys for Defendants/Counter-Plaintiffs*

18 BYRNES KELLER CROMWELL LLP

19 s/ Bradley S. Keller
20 Bradley S. Keller, WSBA # 10665
21 1000 Second Avenue, 38th Floor
22 Seattle, Washington 98104
23 Telephone: (206) 622-2000
24 Facsimile: (206) 622-2522
bkeller@byrneskeller.com

25 *Attorneys for Plaintiff/Counter-Defendant*

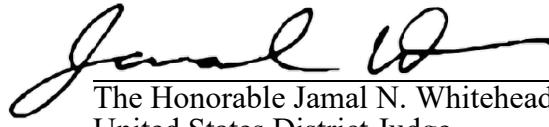
26 BARG SINGER HOESLY PC

27 s/ Cody Hoesly
28 Cody Hoesly, WSBA #41190
29 121 SW Morrison St., Suite 600
30 Portland, Oregon, 97204
31 Ph.: (503) 241-3311
32 choesly@bargsinger.com

33 *Attorneys for Intervenor*

1 IT IS SO ORDERED.
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4 DATED this 14th day of November, 2024.
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11 The Honorable Jamal N. Whitehead
12 United States District Judge
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STIPULATED MOTION AND [PROPOSED] ORDER
CONTINUING FRCP 26(a)(2) EXPERT DISCLOSURE - 4
(No. 2:24-CV-00025-JNW)

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1015 Second Avenue, Floor 10
Seattle, Washington 98104-1001
Tel (206) 625-8600
Fax (206) 625-0900